

6.3 SUBSURFACE GAS

The potential for subsurface gas generation and migration to affect environmental or human targets from any of the units at this facility is minimal.

6.4 SURFACE WATER

No releases to surface water have been documented at this facility. There is a potential for surface water contamination from SWMU 27. Run-off from the SWMU may enter on-site drainage ditches that lead off-site. The SWMU manages waste pea gravel that contains small amounts of naphtha, lead, and arsenic.

The probability of environmental or human targets being directly affected by a release through surface water is minimal.

6.5 GROUND WATER

The depth of ground water at the facility is approximately 15 feet below the ground surface. Any release to soils or surface water will probably affect ground water if the release is not remediated.

The water-bearing unit used for drinking water purposes in the area is the Hosston or "lower Trinity Sand" or the "Second Trinity." The Hosston is reached at variable depths in the Temple area, usually between 1,500 feet and 2,000 feet below the ground surface. Although there are similar isolated water tables at shallower depths, most are not fit for human consumption and it is therefore necessary to tap into the deeper water producing horizon.

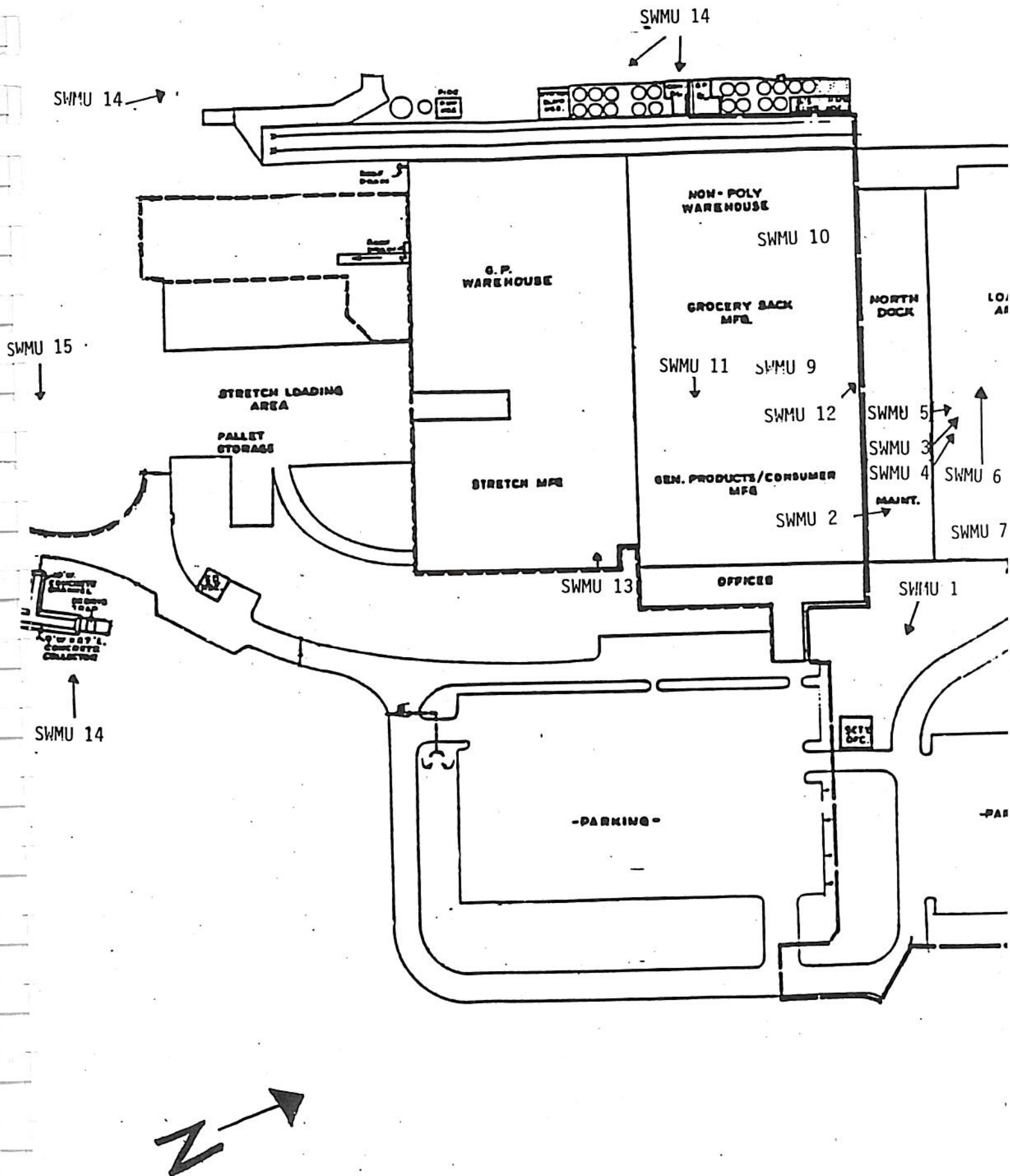
Ground-water contamination has occurred as a result of a September 1981 release of 10,000 gallons of isopentane from AOC 1. When the release was discovered, Mobil Chemical Company pumped approximately 250 55-gallon drums of contaminated ground water from the area surrounding the unit. Mobil installed a monitoring well network and monitors the ground water on a monthly basis. Analyses of ground water currently indicate concentrations of isopentane in ground water at levels from not-detected to 38 ppm. The unit is expected to be closed in June of 1992 according to an approved closure plan that is currently being drafted. There is a high potential for ground-water contamination at this unit.

There is a moderate potential for ground water contamination due to infiltration and/or percolation of wastes from SWMU 27. The SWMU manages waste pea gravel that contains small amounts of naphtha, lead, and arsenic.

The probability of environmental or human targets being directly affected by a release from these units is minimal.

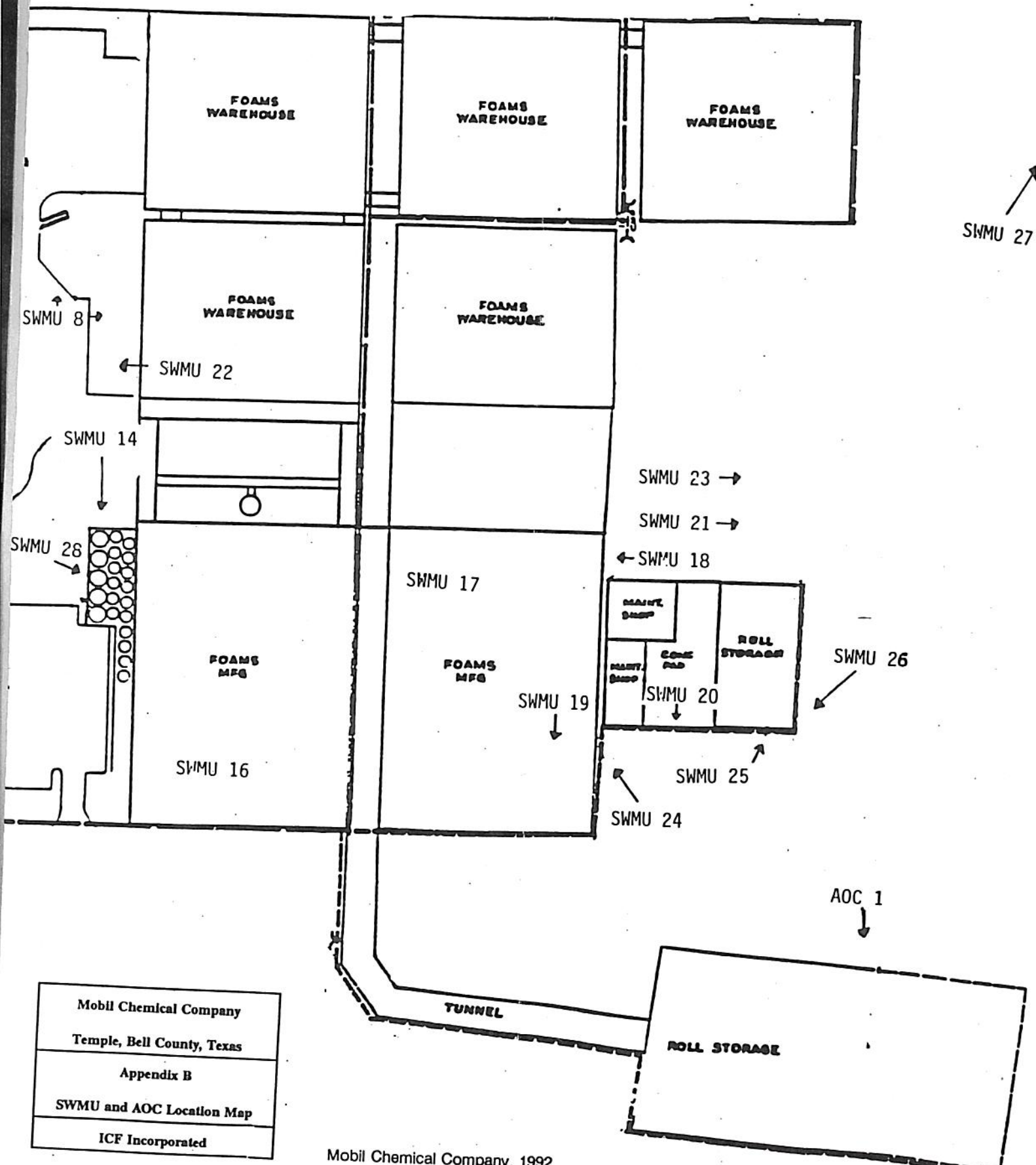
APPENDIX B

SOLID WASTE MANAGEMENT UNITS AND AREAS OF CONCERN LOCATION MAP



SWMUs #9, 10, 16, and 17 are located at various locations throughout the General Products and Foam plants.

MOBIL CHEMICAL COMPANY-TEMPLE PLANT



7.0 CONCLUSIONS AND RECOMMENDATIONS

Twenty-eight SWMUs and one AOC have been identified at Mobil Chemical Company. All but one of the SWMUs are active. The active SWMUs and AOCs include:

- Tray Cleaning and Rinse Stations (SWMU 2)
- ALAR System (SWMU 3)
- Mop-water Tank (SWMU 4)
- General Products Plant Non-hazardous Drum Storage Area (SWMU 5)
- Ink Waste Roll-off Container (SWMU 6)
- General Products Plant Scrap Metal Roll-off Container (SWMU 7)
- General Products Plant Trash Compactor/40-cubic yard Roll-off Container (SWMU 8)
- General Products Plant Safety Kleen Stations (SWMU 9)
- General Products Plant Satellite Accumulation Areas (SWMU 10)
- Sandblasting Unit (SWMU 11)
- Scrap Metal Collection Bin (SWMU 12)
- Waste Oil Management System (SWMU 13)
- Pellet Retention Screens (SWMU 14)
- Scrap Metal Storage Area (SWMU 15)
- Foam Plant Safety Kleen Stations (SWMU 16)
- Foam Plant Satellite Accumulation Areas (SWMU 17)
- Temporary Used Oil Accumulation Area (SWMU 18)
- Pentane Recovery System (SWMU 19)
- Hazardous Waste Accumulation Area (SWMU 20)
- Foam Plant Scrap Metal Roll-off Container (SWMU 21)
- Foam Plant Trash Compactor/40 Cubic Yard Roll-off Container (SWMU 22)
- Foam Plant General Refuse Roll-off Container (SWMU 23)
- Polystyrene Sludge Satellite Accumulation Area (SWMU 24)
- Foam Plant Nonhazardous Drum Storage Area (SWMU 25)
- Foam Plant Hazardous Waste Drum Storage Area (SWMU 26)
- Construction Debris Accumulation Area (SWMU 27)
- Foam Plant Air Abatement Units (SWMU 28)
- Isopentane Underground Storage Tank (AOC 1)

Table 7-1 summarizes the status, waste type, waste management, releases, migration pathways, and remedial actions for all SWMUs and AOCs.

There have been three documented releases of hazardous wastes at the Mobil Chemical Company facility. Based on the VSI conducted on January 6, 1992, there is evidence that significant contaminant releases to the environment have occurred from SWMU 1 (Underground Storage Tank System) and AOC 1 (Isopentane Underground Storage Tank). At the time of the VSI, there was no evidence that contamination resulting from releases from these units had migrated off-site. SWMU 1 has been closed according to an approved closure plan, and is awaiting final closure certification from the TWC. A closure plan is being prepared for AOC 1 at this time. The facility has voluntarily instituted a ground-water monitoring program for this unit and sampling is conducted monthly.

Table 7-1

SWMU and AOC Summary

Mobil Chemical Company
Temple, Texas

Unit	SWMU No. 1	SWMU No. 2	SWMU No. 3
Unit Name	Underground Storage Tank System	Tray Cleaning and Rinse Stations	ALAR System
Description	1-4,000 gal haz. waste tank on concrete slab. Drains routed rain water to sump.	Steel wash tank and rinse tank on concrete pad.	Treatment system on roofed and walled concrete pad with 3.5 inch steel berm
Operating Status	Closed - awaiting certification	Active	Active
Regulatory Status	RCRA-regulated	Unregulated	Unregulated
Waste Type	Ink wastes and spent solvents.	Water-based ink solids and wastewater	Water-based ink solids and wastewater
Waste Management	Gravity flow into tank. Removed by vacuum truck.	Trays washed and rinsed. Waste pumped to SWMU 3.	Waste inks dewatered. Wastewater filtered.
Release History	Spill of 2 to 5 gal of waste. Second release from old conveyance lines.	None	None
Release Pathway	Soil and ground water	None	None
Remedial Action Taken	Soils and ground-water remediated as part of final closure.	None	None
Release Potential	Low	Low	Low
Potential Pathway	Soil and ground water	None	None
Reason for Release Potential Rating	Unit closed according to TWC-approved closure plan.	Nonhazardous waste. Unit inside of building on concrete pad.	Unit has secondary containment. Wastewater filtered before discharge.
Need for RFI	None	None	None

Table 7-1
(continued)

Unit	SWMU No. 4	SWMU No. 5	SWMU No. 6
Unit Name	Mop-water Tank	General Products Plant Non-hazardous Drum Storage Area	Ink Waste Roll-off Container
Description	Stainless steel closed-topped tank (2 feet x 6 feet x 3 feet) inside secondary containment structure	135 square foot concrete pad with 3.5 inch steel berm	30 cubic yard covered steel container on concrete pad with 4 inch concrete curb
Operating Status	Active	Active	Active
Regulatory Status	Unregulated	Unregulated	Unregulated
Waste Type	Ink wastewater	Polybutene, empty drums, spent filters, spent carbon	Dewatered ink solids
Waste Management	Wastewater sent to SWMU 3	Shipped off-site for fuel blending or disposal	Shipped off-site for disposal
Release History	None	None	None
Release Pathway	None	None	None
Remedial Action Taken	None	None	None
Release Potential	Low	Low	Low
Potential Pathway	None	None	None
Reason for Release Potential Rating	Good primary and secondary containment	Good primary and secondary containment	Good primary and secondary containment
Need for RFI	None	None	None

Table 7-1

(continued)

Unit	SWMU No. 7	SWMU No. 8	SWMU No. 9
Unit Name	General Products Plant Scrap Metal Roll-off Container	General Products Plant Trash Compactor/40-cubic yard Roll-off Container	General Products Plant Safety Kleen Stations (6)
Description	20 cubic yard covered steel container on concrete pad (no berm)	Trash compactor and 40 cubic yard steel container on concrete pad	14 inch x 30 inch metal sink over a 30 or 60 gallon drum
Operating Status	Active	Active	Active
Regulatory Status	Unregulated	Unregulated	Unregulated
Waste Type	Scrap metal	General plant refuse	Contaminated naphtha
Waste Management	Sold for scrap for recycle	Shipped to Temple Landfill	Sent off-site for recycle
Release History	None	None	None
Release Pathway	None	None	None
Remedial Action Taken	None	None	None
Release Potential	Low	Low	Low
Potential Pathway	None	None	Air
Reason for Release Potential Rating	Unit covered at all times	Closed-topped unit	Waste contained in enclosed tank that is covered when not in use
Need for RFI	None	None	None

Table 7-1

(continued)

Unit	SWMU No. 10	SWMU No. 11	SWMU No. 12
Unit Name	General Products Plant Satellite Accumulation Areas (50)	Sandblasting Unit	Scrap Metal Collection Bin
Description	50 5-gal closed-topped steel containers on concrete pads	Steel and glass tank 4 feet x 3 feet x 5 feet on concrete pad	Open-top steel 55-gallon drum on wooden platform. Platform on cement pad.
Operating Status	Active	Active	Active
Regulatory Status	Unregulated	Unregulated	Unregulated
Waste Type	Contaminated rags and empty aerosol cans	Contaminated sand	Scrap metal
Waste Management	Rags sent off-site for cleaning and reuse. Cans sent to SWMU 7	Unknown by facility representatives	Sent to SWMU 7
Release History	None	Waste sand on concrete pad identified during VSI	None
Release Pathway	None	Air	None
Remedial Action Taken	None	None	None
Release Potential	Low	High	Low
Potential Pathway	None	Air	None
Reason for Release Potential Rating	Units covered at all times when not in use	Inhalation of particulate matter may pose a potential threat to human health.	Unit has not managed hazardous waste
Need for RFI	None	Conditional	None

Table 7-1
(continued)

Unit	SWMU No. 13	SWMU No. 14	SWMU No. 15
Unit Name	Waste Oil Management System	Pellet Retention Screens	Scrap Metal Storage Area
Description	2700 gal steel tank and associated piping on bermed concrete pad	Steel debris collection screens on concrete pads and culverts	Unbermed asphalt and gravel pad (150 feet x 25 feet)
Operating Status	Active	Active	Active
Regulatory Status	Unregulated	Unregulated	Unregulated
Waste Type	Waste oil	Resin pellets, polystyrene fluff, general plant debris	Scrap metal
Waste Management	Shipped off-site for fuel blending	Waste collected and shipped off-site for disposal or recycle	Waste sent to SWMU 7 for sale as scrap
Release History	None	None	None
Release Pathway	None	None	None
Remedial Action Taken	None	None	None
Release Potential	Low	Low	Low
Potential Pathway	Soil	Surface Water	None
Reason for Release Potential Rating	Good primary and secondary containment	Screens cleaned out after each storm event. Good secondary containment.	Unit has never managed hazardous waste
Need for RFI	None	None	None

Table 7-1
(continued)

Unit	SWMU No. 16	SWMU No. 17	SWMU No. 18
Unit Name	Foam Plant Safety Kleen Stations (2)	Foam Plant Satellite Accumulation Areas (20)	Temporary Used Oil Accumulation Area
Description	14 inch x 30 inch metal sink with lid on a 30 gallon drum	20 5-gal closed-topped steel containers on concrete pads	Steel collection pan on top of a 15-gallon steel drum.
Operating Status	Active	Active	Active
Regulatory Status	Unregulated	Unregulated	Unregulated
Waste Type	Contaminated naphtha	Contaminated rags and empty aerosol cans	Waste oil
Waste Management	Sent off-site for recycle	Rags sent off-site for cleaning and reuse. Cans sent to SWMU 22	Transferred to SWMU 20 prior to off-site disposal
Release History	None	None	None
Release Pathway	None	None	None
Remedial Action Taken	None	None	None
Release Potential	Low	Low	Low
Potential Pathway	Air	None	None
Reason for Release Potential Rating	Waste contained in enclosed tank that is covered when not in use	Units covered at all times when not in use	Good primary and secondary containment
Need for RFI	None	None	None

Table 7-1
(continued)

Unit	SWMU No. 19	SWMU No. 20	SWMU No. 21
Unit Name	Pentane Recovery System	Hazardous Waste Accumulation Area	Foam Plant Scrap Metal Roll-off Container
Description	3 Pentane Condenser Recovery Units	340 gallon above-ground tank inside bermed concrete secondary containment structure	20 cubic yard open-topped steel container on concrete pad
Operating Status	Active	Active	Active
Regulatory Status	Unregulated	Unregulated	Unregulated
Waste Type	Polystyrene foam scrap	Polystyrene sludge and spent solvents (F005, D001)	Scrap metal
Waste Management	Contaminated wastewater sent to SWMU 20 for off-site disposal	Waste accumulated in containers and sent off-site for disposal	Sold for salvage
Release History	None	None	None
Release Pathway	None	None	None
Remedial Action Taken	None	None	None
Release Potential	High	Low	Low
Potential Pathway	Surface water	None	None
Reason for Release Potential Rating	Condensed pentane leaking from faulty valve into drain to city sewer identified during VSI	Good primary and secondary containment	Unit covered with tarp at all times
Need for RFI	None	None	None

Table 7-1
(continued)

Unit	SWMU No. 22	SWMU No. 23	SWMU No. 24
Unit Name	Foam Plant Trash Compactor/40 Cubic Yard Roll-off Container	Foam Plant General Refuse Roll-off Container	Polystyrene Sludge Satellite Accumulation Area
Description	Trash compactor and 40 cubic yard steel container on concrete pad	40 cubic yard steel container on a packed soil/gravel surface	55-gallon plastic drum on a 3 foot x 10 foot bermed concrete pad
Operating Status	Active	Active	Active
Regulatory Status	Unregulated	Unregulated	Unregulated
Waste Type	General plant refuse	Scrap wood, cardboard, plastic and concrete	Polystyrene sludge
Waste Management	Shipped to Temple Landfill for disposal	Shipped to Temple Landfill for disposal	Transferred to SWMU 20 and then off-site for disposal
Release History	None	None	None
Release Pathway	None	None	None
Remedial Action Taken	None	None	None
Release Potential	Low	Low	Low
Potential Pathway	None	None	None
Reason for Release Potential Rating	Unit covered at all times	Unit has not managed hazardous waste	Good primary and secondary containment
Need for RFI	None	None	None

Table 7-1

(continued)

Unit	SWMU No. 25	SWMU No. 26	SWMU No. 27
Unit Name	Foam Plant Non-hazardous Drum Storage Area	Foam Plant Hazardous Waste Drum Storage Area	Construction Debris Accumulation Area
Description	23 foot x 13 foot concrete pad with 1.5 inch high concrete berm	40 foot x 15 foot concrete pad surrounded by a 3 inch concrete berm	150,000 square foot area of ground covered with shrubbery and scattered trenches
Operating Status	Active	Active	Active
Regulatory Status	Unregulated	Unregulated	Unregulated
Waste Type	Waste oils, empty used drums	Waste oils, product, PCB-contaminated and non-PCB capacitors	Construction debris, clean soil, clean pea gravel from UST removal
Waste Management	Waste oil shipped off-site for fuel blending. Scrap metal sold for scrap.	Waste oil shipped off-site for fuel blending. PCB wastes to be manifested and sent to approved incinerator	Clean soil and pea gravel to be reused on-site. Other wastes to be shipped to Temple landfill or sold as scrap
Release History	None	None	None
Release Pathway	None	None	Soil, surface water, ground water
Remedial Action Taken	None	None	None
Release Potential	Low	Low	Moderate
Potential Pathway	None	None	Soil, surface water, ground water
Reason for Release Potential Rating	Good primary and secondary containment	Good primary and secondary containment	Unit manages waste containing hazardous constituents
Need for RFI	None	None	Yes

Table 7-1
(continued)

Unit	SWMU No. 28	AOC No. 1
Unit Name	Foam Plant Air Abatement Units	Isopentane Underground Storage Tank
Description	Filter bags and bag houses	50,000 gallon underground steel storage tank with associated conveyance lines (above-ground and underground)
Operating Status	Active	Active
Regulatory Status	Unregulated	Unregulated
Waste Type	Polystyrene fluff	Isopentane (product)
Waste Management	Waste collected on bags and then sent back to front of process for reuse. Waste filter bags sent to Temple Landfill.	NA
Release History	None	Release of 10,000 gallons of isopentane from a 3 inch underground conveyance pipe
Release Pathway	None	Soil, ground water
Remedial Action Taken	None	Ground-water extraction and installation of monitoring system
Release Potential	Low	High
Potential Pathway	Air	Soil, ground water
Reason for Release Potential Rating	Units are enclosed and equipped with an alarm to detect any breakage of the filters.	Latest ground-water monitoring results indicate that contaminants are still present in ground water.
Need for RFI	None	Conditional - continue coordination with EPA, TWC, and the City of Temple to remediate the area and close the unit.

Based on the PR, VSI, and subsequent correspondence with facility personnel, a RCRA Facility Investigation is warranted for the following:

- Sandblasting Unit (SWMU No. 11) (Conditional)
- Construction Debris Accumulation Area (SWMU No. 27)

REFERENCES

1. RFA Field Logbooks, 1992, Mobil Chemical Company. January 6, 1992.
2. Mobil Chemical Company, 1992, Slide Presentation Transcript. 1992.
3. Mobil Chemical Company, 1992, Facility Information Compilation. January 6, 1992
4. NAS Environmental Consultants and Engineers, 1991, Closure Report for Underground Storage Tank System. September 4, 1991.
5. Mobile Chemical Company, 1980, RCRA Part A Permit Application for Mobile Chemical Company. November 18, 1980.
6. USDA, Soil Conservation Service, 1977, Soil Survey of Bell County, Texas. March 1977.
7. USEPA, 1986, RCRA Facility Assessment Guidance Document. 1986.
8. Mobil Chemical Company, 1992, Personal Communication with Dwight Clayton, et al. January 31, 1992.

APPENDIX A

SUMMARY TRIP REPORT AND PHOTOGRAPHS

Summary Trip Report

An introductory meeting, lasting approximately one hour, was held with Mobil Chemical Company personnel at 8:30 a.m. on January 6, 1992. During the meeting, facility personnel discussed the history of the facility, and the various processes and operations of the facility. They also discussed the wastes generated and various waste management practices at the facility. Donald Hammer, the ICF Field Team Leader, discussed the purpose of the site visit and planned the schedule for the VSI with the facility representatives.

The VSI was performed on January 6, 1992. The following individuals were present during the inspection:

<u>Name</u>	<u>Representative of</u>
Donald Hammer	ICF Incorporated
Michael Lanz	ICF Incorporated
Dwight Clayton	Mobil Chemical Company
James Gavin	Mobil Chemical Company
Patrick Mullin	Mobil Chemical Company

The inspection began at the Underground Storage Tank System (SWMU 1) area. From there the inspection team went into the General Products plant that contains the tray cleaning and rinse stations (SWMU 2). Next the team visited the ALAR system area where they inspected SWMUs 3 through 6. From there the team moved outside to the 40 cubic yard roll-off container and trash compactor (SWMUs 7 and 8). Next, the team did a general walk-through of the production areas in the General Products plant and inspected the Safety Kleen stations and the Satellite Accumulation Areas (SWMUs 9 and 10). From there the inspection team visited the sandblasting unit (SWMU 11) and the Scrap Metal Collection Bin (SWMU 12). The team then moved on to inspect the area of the Waste Oil Management System (SWMU 13). Next, the inspection team went outside and inspected the Pellet Retention Screens and the Scrap Metal Storage Area (SWMUs 14 and 15). The team then moved on to the Foam plant and during a general walk-through, inspected the Safety Kleen Stations and the Satellite Accumulation Areas (SWMUs 16 and 17). Next, the team visited the Temporary Used Oil Accumulation Area (SWMU 18) and then went to the Reclaim Room to inspect the Pentane Recovery System (SWMU 19). The team then went outside to inspect SWMU 20, the Hazardous Waste Accumulation Area. The team finished the inspection by walking around the remainder of the outside of the plant and inspecting SWMUs 21 through 28, and the Isopentane Underground Storage Tank. The debriefing meeting was held at approximately 3:30 p.m. and the RFA Team left the facility at 4:30 p.m.

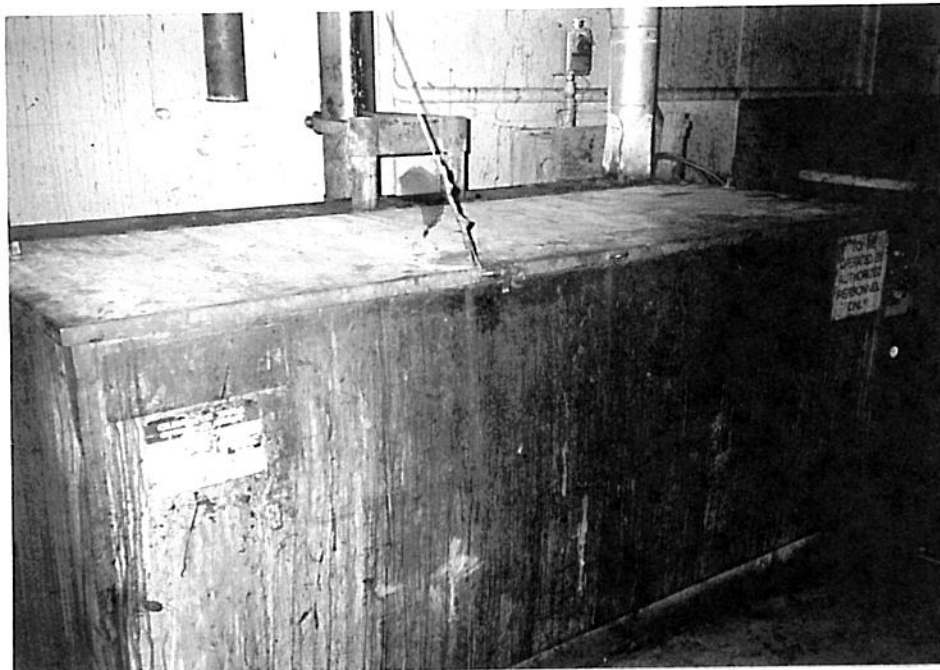
**Visual Site Inspection
Photograph Log
January 6, 1992**

**Mobil Chemical Company
Temple, Texas**

Photographs were taken of all the SWMUs and Areas of Concern during the VSI. Photos taken of areas that were later determined not to be SWMUs or Areas of Concern were not included in this report. Note that the camera lens was obstructed by the photographer at the beginning of the VSI, resulting in partial distortion of photographs 1, 3 and 5. In addition, one set of photographs is stained with green ink which occurred during numbering of the photos for inclusion in the RFA.



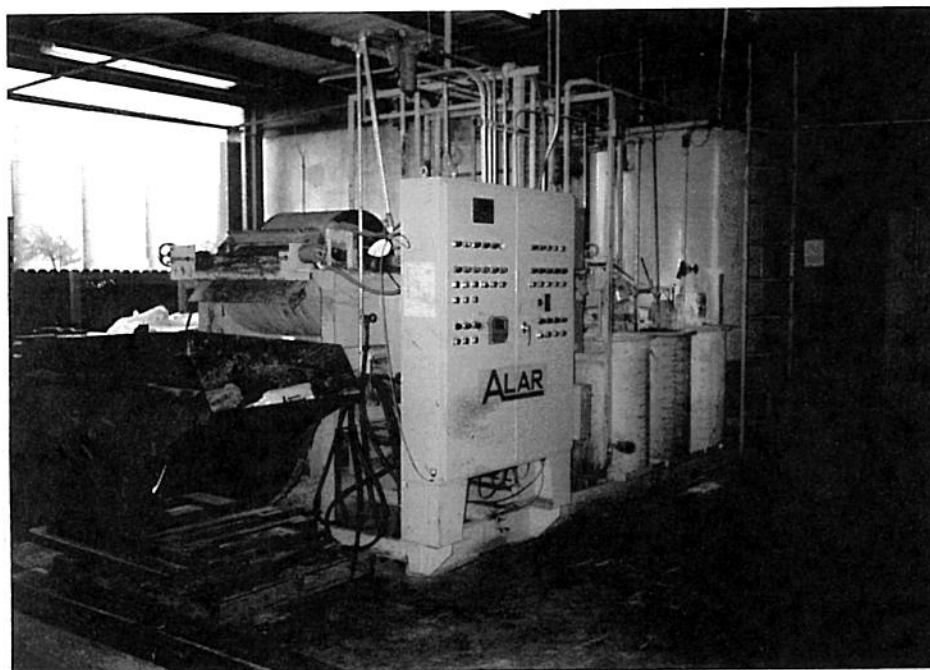
- 1 01-06-92, 9:10 a.m. View to the east. Hazardous Waste Underground Storage Tank (SWMU #1). Photo taken by Michael Lanz.



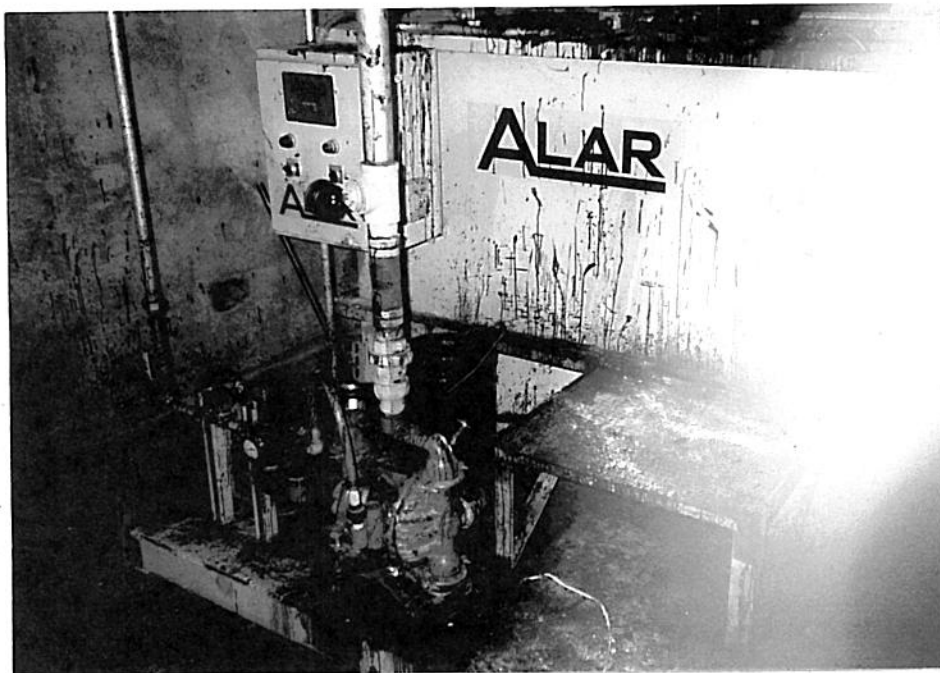
- 2 01-06-92, 9:20 a.m. General Products Graphic Arts Department. Tray Cleaning Station portion of SWMU #2. Staining on outside of unit is water-based ink. Photo taken by Michael Lanz.



- 3 01-06-92, 9:25 a.m. General Products Graphic Arts Department. Tray Rinsing Station - portion of SWMU #2. Staining on outside of unit is water-based ink. Photo taken by Michael Lanz.



- 4 01-06-92, 9:30 a.m. View to the east. Outside General Products Graphic Arts Department. Overview of ALAR System (SWMU #3). Note (from background to foreground) the 1,000-Gallon Mixing Tank, the three Holding Tanks, the Rotating Steel Drum, and the Solid Ink Waste Container. Photo taken by Michael Lanz.



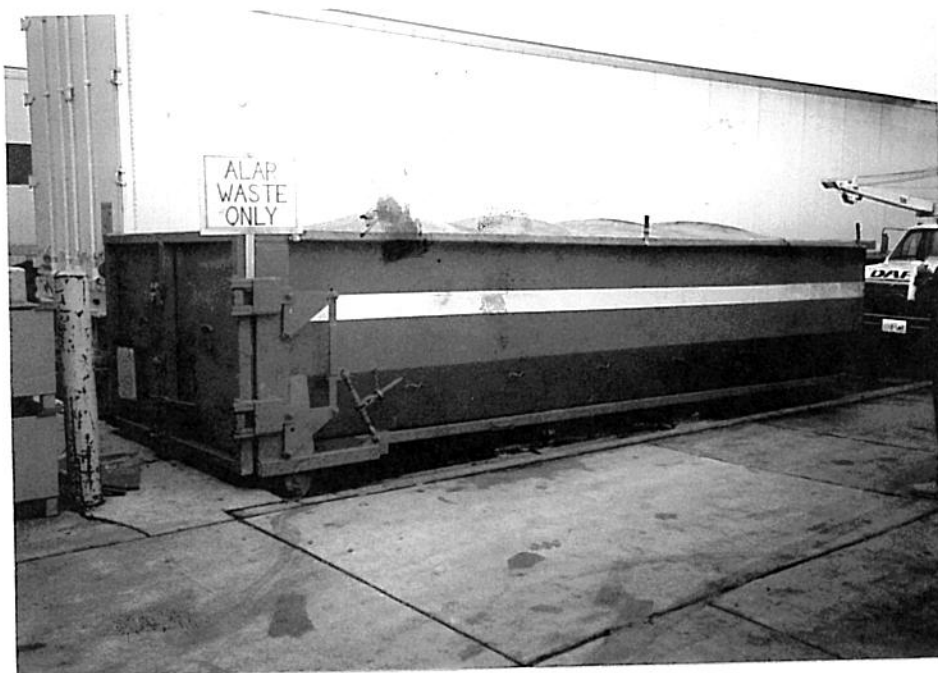
- 5 01-06-92, 9:32 a.m. View to the east. Outside General Products Graphic Arts Department. 500-Gallon Holding Tank with Water Pump of the ALAR System (SWMU #3). The staining on the outside of the container is water-based ink. Photo taken by Michael Lanz.



- 6 01-06-92, 9:40 a.m. View to the south. Outside General Products Graphic Arts Department. Mop Water Tank (SWMU #4). The staining on the outside of the unit and on the wall behind the unit is water-based ink. Photo taken by Michael Lanz.



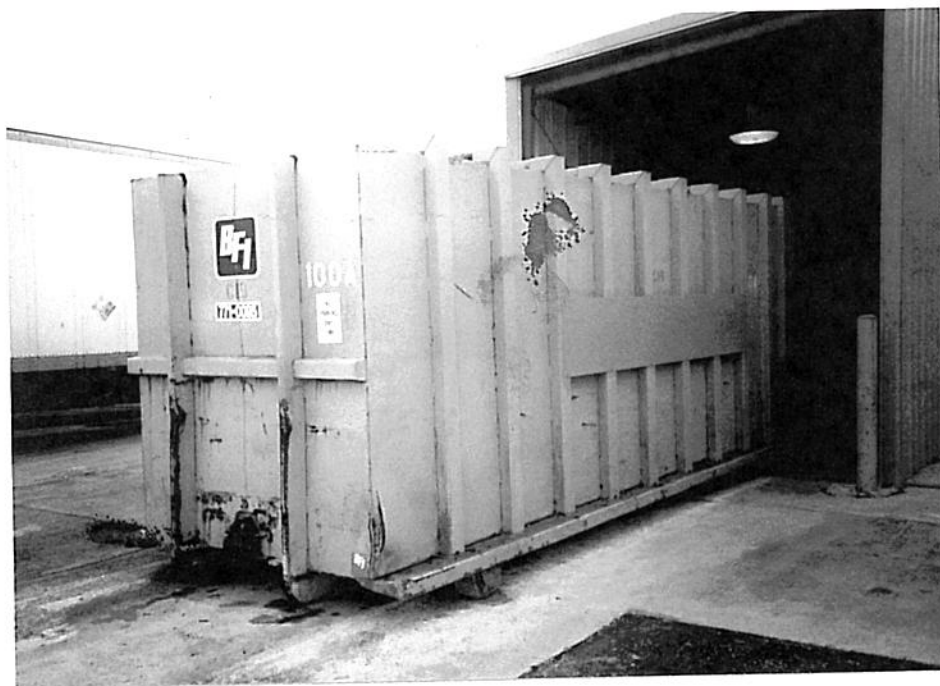
- 7 01-06-92, 9:35 a.m. View to the east. Outside General Products Graphic Arts Department. Nonhazardous Drum Storage Area (SWMU #5). Photo taken by Michael Lanz.



- 8 01-06-92, 9:40 a.m. View to the west. Between the General Products and Foam plants. 30-Cubic Yard Roll-Off Container (SWMU #6). Photo taken by Michael Lanz.



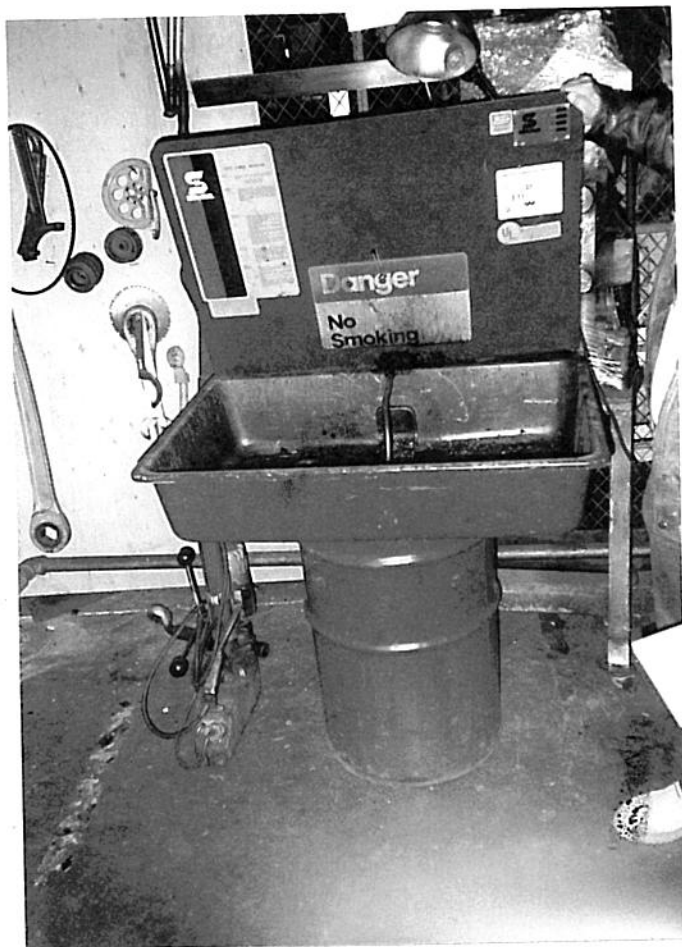
- 9 01-06-92, 9:45 a.m. View facing southeast. Between the General Products and Foam plants. 20-Cubic Yard Scrap Metal Roll-Off Container (SWMU #7). Photo taken by Michael Lanz.



- 10 01-06-92, 9:47 a.m. View facing north. Between stretch film manufacturing and scrap film storage. 40-Cubic Yard Roll-Off Container of Trash Compactor/40-Cubic Yard Roll-Off Container (SWMU #8). Photo taken by Michael Lanz.



- 11 01-06-92, 9:48 a.m. View facing south. Stretch film manufacturing department. Trash Compactor of Trash Compactor/40-Cubic Yard Roll-Off Container (SWMU #8). Photo taken by Michael Lanz.



- 12 01-06-92, 10:00 a.m. One of several views of Safety Kleen Stations in the General Products and Foam plants (SWMUs #9 and 16). 30-gallon capacity. Photo taken by Michael Lanz.



- 13 01-06-92, 10:02 a.m. One of several views of Safety Kleen Stations in the General Products and Foam plants (SWMUs #9 and 16). 60-gallon capacity. Photo taken by Michael Lanz.



- 14 01-06-92, 10:10 a.m. One of several views of Satellite Accumulation Areas in the General Products and Foam plants. (SWMUs #10 and 17) for oily rags: red container. Photo taken by Michael Lanz.



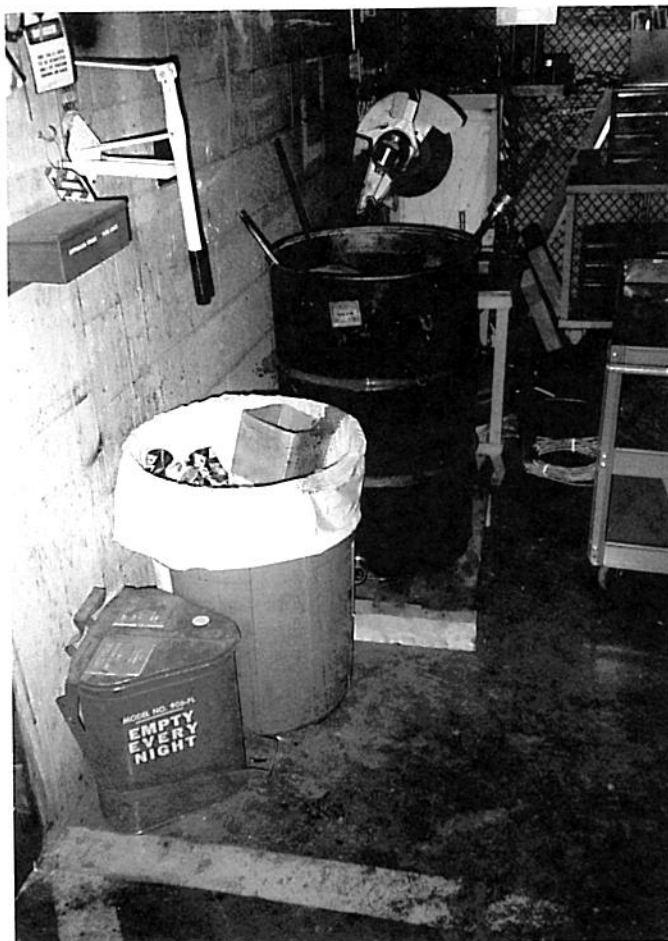
- 15 01-06-92, 10:12 a.m. One of several views of Satellite Accumulation Areas (SWMUs #10 and 17) in the General Products and Foam plants for oily rags: yellow container. Photo taken by Michael Lanz.



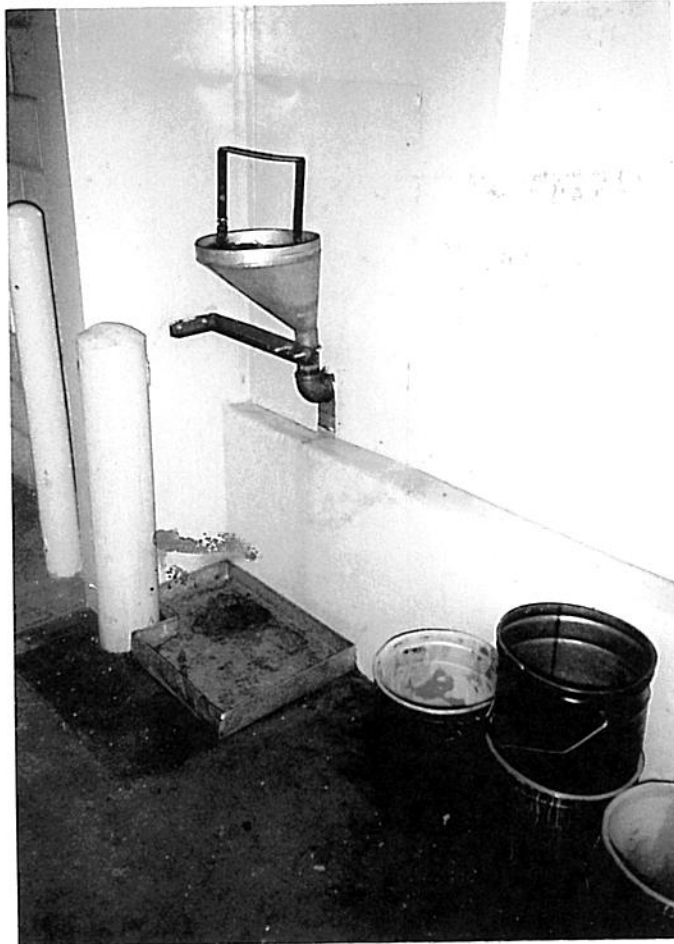
- 16 01-06-92, 10:13 a.m. One of several views of Satellite Accumulation Areas (SWMUs #10 and 17) for aerosol cans: triangular red containers. Photo taken by Michael Lanz.



17 01-06-92, 10:00 a.m. General Products Maintenance Department. Sandblasting Unit (SWMU #11). The white powder on the floor is sand from the sandblasting process. Photo taken by Michael Lanz.



18 01-06-92, 10:05 a.m. General Products Maintenance Department. Scrap Metal Drum Storage Container (SWMU #12). Photo taken by Michael Lanz.



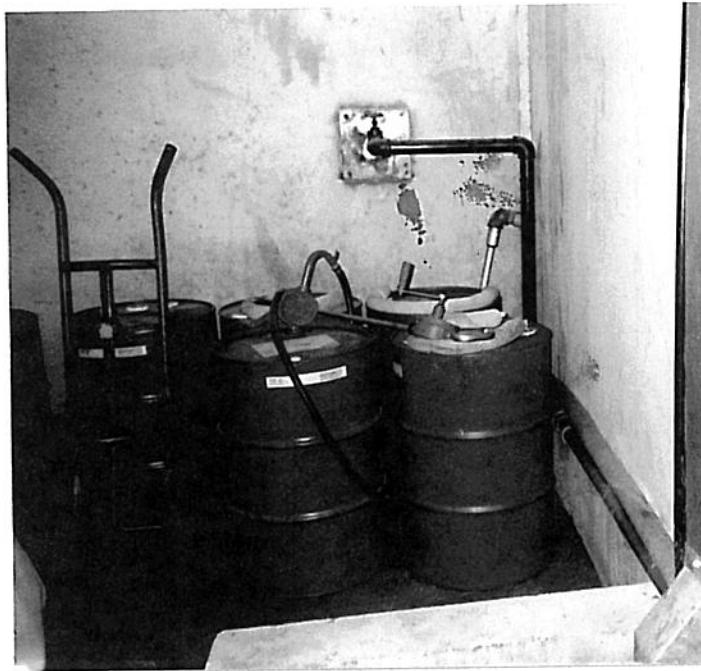
- 19 01-06-92, 10:32 a.m. Between Stretch and General Products Manufacturing Departments, east side of plant. Aluminum Funnel Drain component of Waste Oil Management System (SWMU #13). Photo taken by Michael Lanz.



- 20 01-06-92, 10:34 a.m. Between Stretch and General Products Manufacturing Departments, east side of plant. 2,700-Gallon Above-Ground Waste Oil Tank component of Waste Oil Management System (SWMU #13) Photo taken by Michael Lanz.



- 21 01-06-92, 10:35 a.m. Between Stretch and General Products Manufacturing Departments, east side of plant. Sewer Drain located in 2,700-gallon waste oil tank room (SWMU #13). Photo taken by Michael Lanz.



- 22 01-06-92, 10:40 a.m. Between Stretch and General Products Manufacturing Departments, east side of plant. Pipe component of Waste Oil Management System (SWMU #13), leading to the Truck Hook-Up (outside building). Photo taken by Michael Lanz.



- 23 01-06-92, 10:45 a.m. View facing west. East side of Stretch and General Manufacturing Departments. Truck Hook-Up component of the Waste Oil Management System (SWMU #13). Photo taken by Michael Lanz.



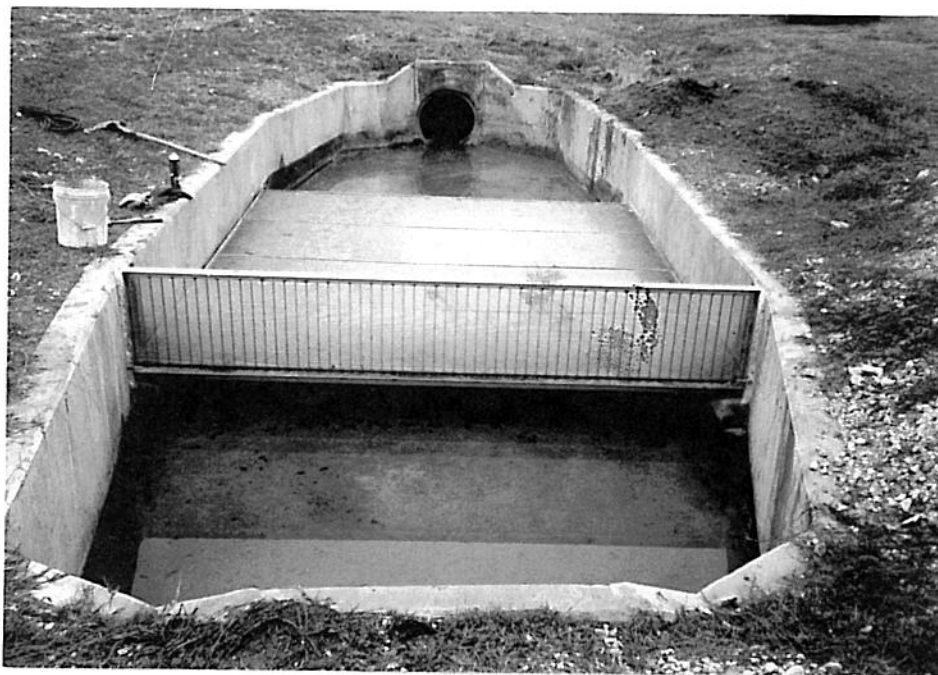
24 01-06-92, 10:50 a.m. View to the north, with Stretch plant in background. Pellet Retention Screen-Southwest Outfall. (SWMU #14) Photo taken by Michael Lanz..



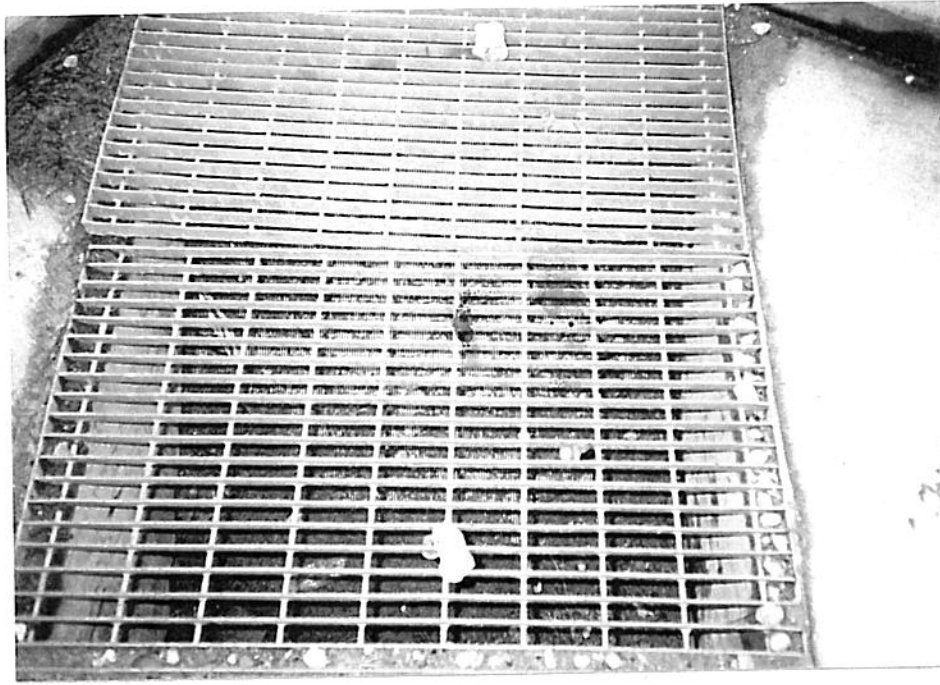
25 01-06-92, 10:52 a.m. View to the south. Pellet Retention Screen-Southwest Outfall (SWMU #14). Photo taken by Michael Lanz.



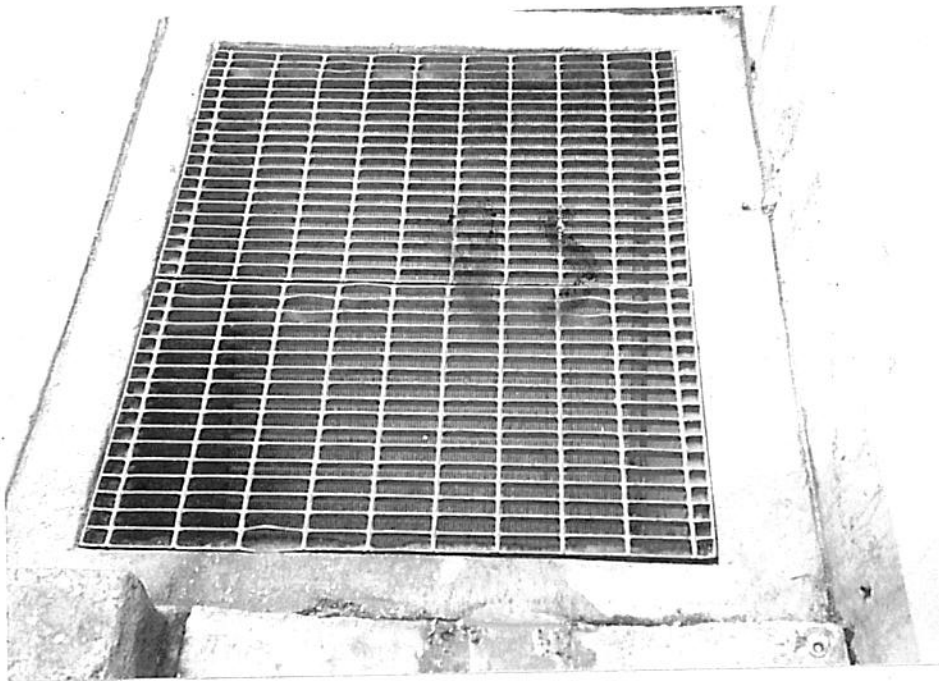
26 01-06-92, 10:53 a.m. View to the west. Pellet Retention Screen-Southeast Outfall (SWMU #14). Photo taken by Michael Lanz.



27 01-06-92, 10:54 a.m. View to the north. Pellet Retention Screen-West Outfall (SWMU #14). Photo taken by Michael Lanz.



28 01-06-92, 10:58 a.m. View facing northwest. Pellet Retention Screen-Polystyrene Unload Area (SWMU #14). Photo taken by Michael Lanz.



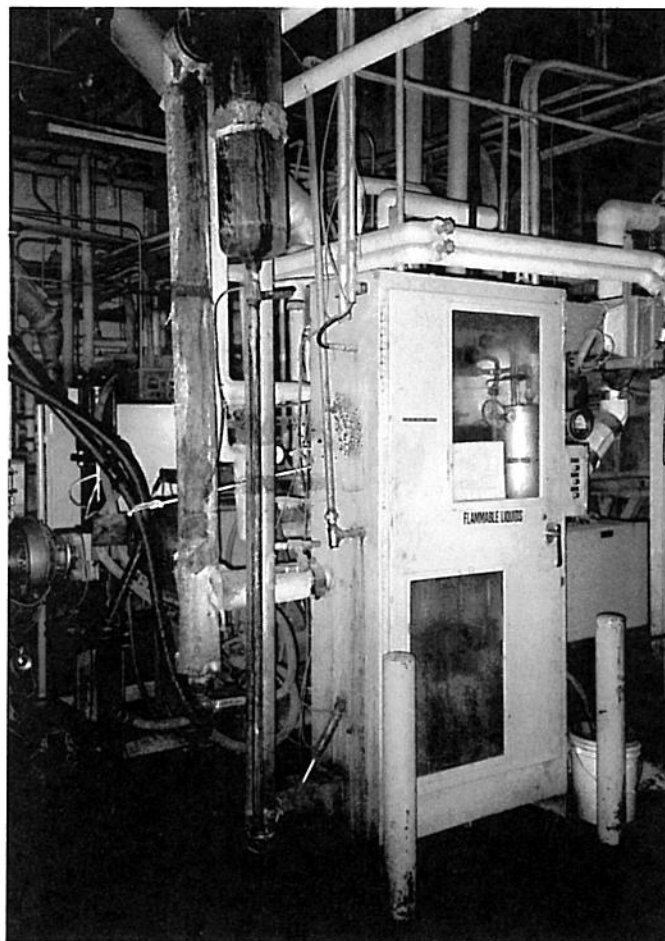
29 01-06-92, 10:59 a.m. View facing west. Pellet Retention Screen-West End of Polystyrene Silo Area (SWMU #14). Photo taken by Michael Lanz.



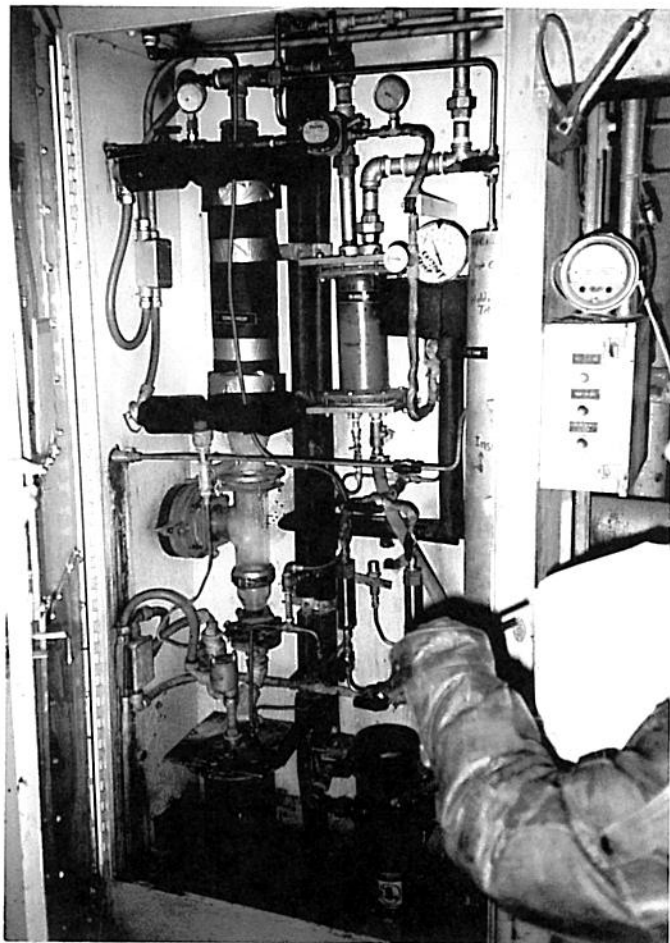
30 01-06-92, 11:30 a.m. View facing southeast. Scrap Metal Storage Area (SWMU #15).
Photo taken by Michael Lanz.



- 31 01-06-92, 12:15 p.m. Maintenance area of Foams plant. Temporary Used Oil Accumulation Area (SWMU #18). Photo taken by Michael Lanz.



- 32 01-06-92, 12:30 p.m. Foam plant Pentane Reclaim Department. Pentane Condenser Unit (SWMU #19). Photo taken by Michael Lanz.



33 01-06-92, 12:32 p.m. Foam plant Pentane Reclaim Department. Inside of Pentane Condenser Unit (SWMU #19). Photo taken by Michael Lanz.



- 34 01-06-92, 12:32 p.m. Area under Knock-Out Pot (SWMU #19). Note leaked oil on floor and in drain from Knock-Out Pot with faulty valve. Photo taken by Michael Lanz.



- 35 01-06-92, 12:35 p.m. View to the north. Outside Foam plant Pentane Reclaim Department. Hazardous Waste Accumulation Area (SWMU #20). Water in bermed area is rain water containing pieces of polystyrene resin. Photo taken by Michael Lanz.



- 36 01-06-92, 12:37 p.m. View facing west. Outside of Foam plant Pentane Reclaim Department. Standing rain water in bermed area of Hazardous Waste Accumulation Area (SWMU #20). Water in bermed area is rainwater. Photo taken by Michael Lanz.



- 37 01-06-92, 12:55 p.m. View to the east. Between Foams manufacturing and the old roll storage building. 20-Cubic Yard Scrap Metal Roll-Off Container (SWMU #21). Photo taken by Michael Lanz.



- 38 01-06-92, 12:57 p.m. View to the south. Southeast corner of Foams Warehouse. Trash Compactor of Trash Compactor/40-Cubic Yard Roll-Off Container (SWMU #22). Photo taken by Michael Lanz.



- 39 01-06-92, 12:58 p.m. View facing north. Roll-Off Container of Trash Compactor/40-Cubic Yard Roll-Off Container (SWMU #22). Photo taken by Michael Lanz.



- 40 01-06-92, 12:57 p.m. View facing east. Between Foams manufacturing and old roll storage. 40-Cubic Yard Roll-Off Container (SWMU #23). Photo taken by Michael Lanz.



- 41 01-06-92, 1:00 p.m. View facing south. North side of the Foams manufacturing building. Satellite Accumulation Area for Polystyrene Sludge (SWMU #24). Photo taken by Michael Lanz.



- 42 01-06-92, 1:10 p.m. View to the west. East of the old roll storage building. Drum Storage Area (SWMU #25). Photo taken by Michael Lanz.



- 43 01-06-92, 1:12 p.m. View to the west. East of the old roll storage building. 340-Gallon Used Oil Tank located in Drum Storage Area (SWMU #25). Note: There is a hazardous waste label on the container, but facility representatives claim that it was mislabeled. Photo taken by Michael Lanz.



- 44 01-06-92, 1:15 p.m. View to the west. North side of old roll storage building. Hazardous Waste Container Storage Area (SWMU #26). Photo taken by Michael Lanz.



- 45 01-06-92, 1:17 p.m. View to the west. North side of old roll storage building. Bermed area around Hazardous Waste Container Storage Area (SWMU #26). Photo taken by Michael Lanz.



46 01-06-92, 1:25 p.m. View to the north. Construction Debris Pile (SWMU #27). Photo taken by Michael Lanz.



47 01-06-92, 1:27 p.m. View to the west. Construction Debris Pile (SWMU #27). Photo taken by Michael Lanz.



48 01-06-92, 1:45 p.m. View to the east. South side of Foams manufacturing building. Bag House Units (SWMU #28). Photo taken by Michael Lanz.



49 01-06-92, 1:30 p.m. View to the east. 50,000-Gallon Isopentane Underground Storage Tank (AOC #1). Photo taken by Michael Lanz.



50 01-06-92, 1:32 p.m. View to the west. Monitoring Well of 50,000-Gallon Isopentane Underground Storage Tank (AOC #1).